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7 HERITAGE TECHNOLOGIES, INC., CARL THOMPSON
and CHARLES WISSMAN

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9 UNITED STATES DISTRICT COURT

10 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

11 | SAN DIEGO DIVISION

12 GREENLEE TEXTRON INC., a Delaware
13 corporation,
14 Plaintiff,
15
16 v.
17 HERITAGE TECHNOLOGIES, INC., a California
18 Corporation; CARL THOMPSON, an individual;
19 CHARLES WISSMAN, an individual; and DOES 1-
10,
Defendants.

Case No.: 07 CV 2038 WQH (RBB)

**JOINT MOTION TO EXTEND TIME
FOR DEFENDANTS TO RESPOND
TO COMPLAINT**

22 **IT IS HEREBY STIPULATED** by and between the parties to the above-entitled
23 action, through their respective counsel, subject to the approval of this Honorable Court, that
24 Defendants' time to answer or otherwise respond to the Complaint be extended up to and
25 including December 19, 2007.

26 This stipulation is made pursuant to CivLR 7.2 and 12.1 and is not entered into for the
27 purposes of inconvenience or delay. Defendant HERITAGE TECHNOLOGIES, INC. has
28 agreed to provide to Plaintiff an exemplar of the accused device and schematic drawings

1 subject to a confidentiality agreement, and Plaintiff will conduct testing on the device to
2 further investigate facts related to the pending patent infringement action. There have been
3 no previous requests to continue the Defendants' time to respond to the Complaint.

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DATED: November 9, 2007

Respectfully submitted,

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THE LAW OFFICE OF
MANUEL DE LA CERRA

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By: s/Manuel de la Cerra

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Manuel de la Cerra

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John L. Roberts

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Attorneys for Defendants HERITAGE

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TECHNOLOGIES, INC., CARL

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THOMPSON and CHARLES WISSMAN

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DATED: November 9, 2007

Respectfully submitted,

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ORRICK, HERRINGTON & SUTCLIFFE LLP

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By: s/Kent B. Goss

Kent B. Goss

Attorneys for Plaintiff GREENLEE

TEXTRON INC.

PROOF OF SERVICE

I am employed in San Diego County, State of California. I am over the age of 18 and not a party to the within action. My business address is 6885 Catamaran Drive, Carlsbad, CA 92011.

On November 9, 2007, I served on the interested parties in said action the following:

- **JOINT MOTION TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO COMPLAINT**
- **[PROPOSED] ORDER TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO COMPLAINT**

by placing a true copy thereof in a sealed envelope addressed as follows and deposited it in the U.S. Mail at Carlsbad, California:

**Kent B. Goss
Orrick Herrington & Sutcliffe LLP
777 South Figueroa St, Suit 3200
Los Angeles, CA 90017**

Attorney for Greenlee Textron, Inc

I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 9, 2007 at Carlsbad, California.

____s/Manuel F. de la Cerra _____
Manuel F. de la Cerra